

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Diana Robertson

GENERAL INFORMATION:

Name:	The United States Playing Card Company
Address:	300 Gap Way Erlanger, KY 41018
Date application received:	1/13/2009
SIC Code/SIC description:	2752, Commercial Printing, Lithographic (except quick printing)
Source ID:	21-015-00166
Agency Interest:	47208
Activity:	APE20090001
Permit:	F-09-007

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input checked="" type="checkbox"/> Conditional major
__Administrative	<input type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input checked="" type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
__ Non-Attainment	<input type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
__ PSD	<input type="checkbox"/> CAM	
__ Netted out of PSD/NSR		
__ Not major modification per 401 KAR 51:001, 1(116)(b)		

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☐ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☐ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☐ Pollution Prevention Measures
- ☒ Area is non-attainment (list pollutants): ozone

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)*	Allowable (tpy)	Potential (tpy)
PM/PM ₁₀	NA	NA	67.0
SO ₂	NA	NA	0.02
NO _x	NA	NA	3.74
CO	NA	NA	3.14
VOC	NA	25.0	120.1
Lead	NA	NA	NA
Xylene	NA	NA	0.18
Naphthalene	NA	NA	0.03
Cumene	NA	NA	0.09
Toluene	NA	NA	0.09
Ethyl benzene	NA	NA	0.09
Source wide HAPs	NA	NA	0.48

* The facility has not yet been constructed, and as a result, there have been no actual emissions.

SOURCE DESCRIPTION:

On January 13, 2009, an application was received from The United States Playing Card Company for the construction/operation of a playing card production facility in Erlanger, KY. The facility will be located in Boone County, which is designated as a non-attainment area for ozone, pursuant to 401 KAR 51:010.

The facility consists of several lithographic printing, coating, and laminating processes. Also included are die cutting operations, a finishing area, a trim removal system, and parts washers:

- (01) Press #30 produces sheets of playing cards. The lithographic printing operation is comprised of six perfecting printing units, a perfecting coater, a natural gas-fired dryer/afterburner, which serves as a dryer and as the control for volatile organic compounds (VOC's), and miscellaneous associated operations. The emission sources include the printing, coating, and drying operations.
- (02) Press #26 also produces sheets of playing cards. The sheet-fed offset lithographic printing operation is comprised of 6 printing units, a coating operation, an electric infrared dryer, a spray powder process, and miscellaneous associated operations. The printing and coating processes are emission sources, under no VOC control. The spray powder process, an additional emission source, includes the powder spray operation, an exhaust system, followed by an air filtration system and an exhaust stack.

- (03) The laminating line produces rolls of laminated playing card stock utilizing an aqueous adhesive and a natural gas-fired dryer.
- (04) The coating line, which produces sheets of laminated playing cards, is comprised of a UV coating operation and an electric UV dryer, neither with VOC controls. The isopropyl alcohol clean-up solution is the primary emission source for the process.
- (05) The trim removal system is used to collect paper trim from the die cutting operations and finishing area and has a dust collector system and a return air filter as controls for PM. Each of these systems will have a pressure transmitter connected to the trim removal system control panel. The monitoring panels will continuously display the pressure drop for the filters and when either pressure drop reaches a pre-set point a warning is issued on each panel. Exhaust from the trim removal system is returned into the building.
- (06) Three cold cleaner parts washers are utilized throughout the facility.

In general, inks, fountain solutions, solvents, coating solutions, and clean-up solutions are the primary emission sources of VOC's as well as low levels of hazardous air pollutants. The spray powder process, die cutting operations, and gas-fired dryers are the main sources of PM emissions.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

The source-wide VOC potential emissions, calculated from information in the application submitted by the source, are approximately 120 tons per year. An imposed VOC emission limitation of 25 tons per year will allow the source to operate as a conditional major source and to preclude 401 KAR 52:020 by remaining below the threshold of 100 tons per year. Because the source is located in a non-attainment area for ozone, the limit will also allow the source to operate as a synthetic minor source and to preclude 401 KAR 51:052 by remaining below that threshold of 100 tons per year.

The source-wide volatile organic compound (VOC) emissions shall not exceed 25 tons per year. The annual limitation shall not be exceeded during any consecutive 12-month period for the entire source.

Pursuant to *Cabinet Provisions and Procedures for Issuing Federally-Enforceable Permits for Non-Major Sources*, Section 2(II)(11), a new or reconstructing source that is also a synthetic minor shall not be allowed to construct or operate until the final permit is issued.

OPERATIONAL FLEXIBILITY:

None